

1 DANIEL G. BOGDEN  
2 United States Attorney  
2 District of Nevada

3 MICHAEL A. HUMPHREYS  
4 Assistant United States Attorney  
5 501 Las Vegas Boulevard South, Suite 1100  
5 Las Vegas, Nevada 89101  
5 Telephone: 702-388-6336  
5 Facsimile: 702-388-6787  
6 Email: Michael.humphreys@usdoj.gov

7 Attorneys for the United States of America

8

9

10 **UNITED STATES DISTRICT COURT**

11

12 **DISTRICT OF NEVADA**

13

14 UNITED STATES OF AMERICA, ) 2:11-CR-434-LDG-(PAL)  
15 Plaintiff, )  
16 v. )  
15 EDUARD PETROIU, *et. al.*, ) **STIPULATED MOTION TO CONTINUE**  
16 Defendant. ) **DISCOVERY**  
16 ) (Second Request)

17 COME NOW the parties and stipulate and jointly move this Court to continue the discovery  
18 cut-off in the above-captioned case until September 30, 2016. The parties have already engaged in  
19 extensive 'paper' discovery including propounding interrogatories and requests for production of  
20 documents on the Claimants, which have been, more or less answered by the Claimants. The United  
21 States has received and analyzed this paper discovery and was prepared to depose both claimants,  
22 Atanas and Mariya Nedyalkova. However, Claimants' counsel recently informed counsel for the  
23 Government that both Atanas and Mariya Nedyalkova are out of the country and will not return until  
24 early August 2016. Thus, the parties will not be able to conclude the discovery phase of this case  
25 until the Nedyalkovas return to the United States.

26 ///

Given the foregoing, the parties have agreed to request that this Court extend the discovery cut-off deadline in this matter until September 30, 2016.

This motion is not submitted solely for the purpose to delay or for any other improper purpose.

WHEREFORE, the parties move this Court to grant a continuance of the discovery cut-off date until September 30, 2016, for the parties to complete discovery.

Dated this 9th day of May 2016.

Respectfully submitted,

DANIEL G. BOGDEN  
United States Attorney

/s/Michael A. Humphreys  
MICHAEL A. HUMPHREYS

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE  
LLOYD D. GEORGE  
DATED: 13 May 2016